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April 14, 2022

Via ECF and Email

Honorable Thomas I. Vanaskie, Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower, 18th Floor
Philadelphia, Pennsylvania 19103

Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,
No. 1:19-md-02875-RBK (D.N.J.)

Dear Judge Vanaskie:

Attached is Plaintiffs' proposed Special Master Order with regard to Defendants' defend
and indemnify agreements and disputes, as directed at the April 13, 2022 status hearing.

Thank you for your courtesies and consideration.

Respectfully,



ADAM M. SLATER

Encl.

cc: All Counsel (via CM/ECF)